

March 4, 2003

Richard (Rick) Smith Chair, SFER Working Group Senior Governmental Analyst Office of the Governor of Florida The Capitol, Room 1802 Tallahassee, FL 32399-0001

Dear Chairman Smith:

A recent article in the Wall Street Journal (see enclosure – copy of WSJ article) reported that a the Biomass Investment Group (a bio-fuels power generation venture company) has been contracted by JEA (formerly Jacksonville Electric) to build a plant that will convert plant biomass into energy through combustion, and to grow the plant material on the same site. The article stated that the company would be planting *Arundo donax* (giant reed)—native to India—on 8,000 acres of land in the northern Everglades. The South Florida Water Management District has information suggesting it will be planted in Glades County in April 2003, and that an additional 8,000 acres of bamboo—not mentioned in the article—would also be planted.

The article contrasts this proposed "green" use of giant reed in Florida with the serious problems this species has caused as a wetland invader in California. This plant is a serious wetland invader in California (see enclosure – paper by Gary P. Bell) which is currently spending over \$20 million a year to control it on the Santa Ana River alone. The California Exotic Pest Plant Council (Cal EPPC) has listed this species as one of the "most invasive and widespread wildland pest plants" (see enclosure—The Cal EPPC Exotic Pest Plants of Greatest Ecological Concern in California).

This species starts new plants from small fragments of stem or root and in California has been carried from rivers to establish on islands several miles from the coastline, including Channel Islands National Park. It is also a problem in several other states (see enclosures – The Nature Conservancy Element Stewardship Abstract and USDA-ARS News & Information article by Marcia Wood). This plant is also documented to displace native plants and animals and threatens several species in California listed as species of special concern (see enclosure—paper by Gary P. Bell and paper by Tom. L. Dudley).

Giant reed is in Florida (see enclosure—distribution map) but is known to exist only as very isolated individual plants and is not currently extensive enough to be listed as an invader. However, the Florida Exotic Pest Plant Council is very concerned about the species presence in Florida and has raised even greater concern about the possibility of commercial plantings of a species that is documented as invasive in similar habitats. Additionally, recent research in biological invasions tells us that many species have long



lag-times before they become invasive, and that the more available a species is the greater are the chances it will become invasive (see enclosed CD—Weeds Won't Wait, Part Two, page 9).

The Science Coordination Team (SCT) has identified this issue as one of serious concern to Everglades' restoration efforts. Both effort and funding are currently being provided to deal with the existing invasive weed problems threatening the restoration program. To allow another serious invasive weed to be commercially planted in the Everglades defies all logic and is contrary to the most important tenet of weed management science—

prevention.

The Science Coordination Team believes that until we have a much better understanding of the potential threat of the invasiveness of the species, that this species should not be planted in Florida. We strongly urge the Task Force and Working Group to take this matter extremely seriously, and to move quickly to prevent a possible ecological problem with yet another invasive exotic pest plant. This is an important opportunity to show that the SCT, Working Group and Task Force can be proactive in protecting the Everglades' and the Restoration Program from unnecessary threats. The National Invasive Species Management Strategy, Weeds Won't Wait, and the Florida State Agency Invasive Species Management Plan all consider *prevention* as the most important and effective tool in fighting invasive species. *Preventing* this species from being planted in Florida until we have a better understanding of its potential for widespread invasion would be a clear example of our willingness to follow our own expert advice regarding early detection, rapid response and prevention in the management of invasive exotic plants. If, however, because of economic, energy fuel source, or private rights, the decision is made to allow planting, perhaps District, State or Federal permitting agencies could require a financial bonding mechanism to ensure the removal of the species in case it becomes invasive.

Respectfully Submitted,

G. Ronnie Best, PhD, PWS SCT Co-Chair

Terry L. Rice, PhD SCT Co-Chair

cc: SFER Working Group

Executive Director, SFER Task Force